

FILED IN CHAMBERS

United States District Court  
NORTHERN DISTRICT OF GEORGIA

APR 17 2018

*[Signature]*  
U.S. MAGISTRATE JUDGE  
N.D.GEORGIA

UNITED STATES OF AMERICA

v.

TERRELL "RALO" DAVIS, [REDACTED], KEVIN "K" HARP, WILLIAM "CHAOS" RHODES, BRENTON "OG" MITCHELL, ANTOINE "SHONUFF" MORRISON, QUINTAVIS "DRAKKO" SCOTT, BILAL MUHAMMAD, MICHAEL "CUTT" HUNNICUTT, CHRISTIAN "K" HARP AND SHANQUITA POTTS

CRIMINAL COMPLAINT

Case Number: 1:18-MJ-371

UNDER SEAL

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief.

Count One

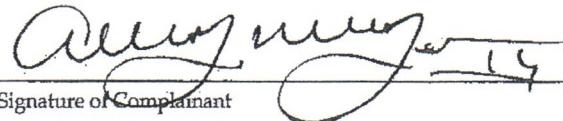
Beginning on a date unknown, but at least by in or about December 2017, and continuing until on or about December 22, 2017, in the Northern District of Georgia and elsewhere, the defendants Terrell "Raló" DAVIS, [REDACTED], [REDACTED], Kevin "K" HARP, did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding with each other and other persons to violate Title 21, United States Code, Section 841(a)(1), that is: to possess with intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

Count Two

Beginning on a date unknown, but at least by in or about April 2018, and continuing until on or about April 15, 2018, in the Northern District of Georgia and elsewhere, the defendants Terrell "Raló" DAVIS, William "Chaos" RHODES, Brenton "OG" MITCHELL, Antoine "Shonuff" MORRISON, Quintavis "Drakko" SCOTT, Bilal MUHAMMAD, Michael "Cult" HUNNICUTT, Christian "K" HARP and Shanquita POTTS did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding with each other and other persons to violate Title 21, United States Code, Section 841(a)(1), that is: to possess with intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

I further state that I am an ATF Special Agent and that this complaint is based on the following facts:  
PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes



Signature of Complainant  
Allan L. McLeod, III

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to before me, and subscribed in my presence

April 17, 2018

Date

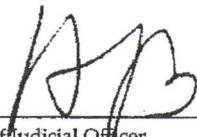
at Atlanta, Georgia

City and State

ALAN J. BAVERMAN  
UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

AUSA Ryan K. Buchanan /



Signature of Judicial Officer

AFFIDAVIT

I, ALLAN L. MCLEOD, III, being duly sworn, depose and state as follows:

1. I am an investigator and law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510(7). I am an officer of the United States, who is empowered to conduct investigations of, and make arrests for, the offenses enumerated in Title 18, United States Code, Section 3051. I am currently employed as a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since 2005.
  
2. I also hold a Bachelor's degree in Criminology from Florida State University located in Tallahassee, Florida. Before joining ATF, I was a sworn police officer in the State of Florida where I worked as an Investigator with the State Attorney's Office in Pensacola, Florida from 2004 to 2005. Since 2005, As an ATF SA, I have completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center and have completed specialized training in the fields of firearms, explosives and arson, and the Federal laws and regulations pertaining thereto, through the ATF SA Basic Training academy. My duties as an ATF SA include, but are not limited to, investigating violations of federal firearms and narcotics laws. My first four years in ATF were spent in the Arson and Explosives group. Since 2010, I have been assigned to Atlanta Group III, a Strategic Atlanta Firearms Enforcement (S.A.F.E.) group, where my duties include the investigation and enforcement of violations of firearms laws, narcotics laws and associated violations encountered in the course of these duties.

**PURPOSE OF AFFIDAVIT**

3. This affidavit is made in support of a criminal complaint charging Terrell "Ralo" DAVIS, [REDACTED] [REDACTED], Kevin "K" HARP, William "Chaos" RHODES, Brenton "OG" MITCHELL, Antoine "Shonuff" MORRISON, Quintavis "Drakko" SCOTT, Bilal MUHUMMAND, Michael "Cutt" HUNNICUTT, Christian "K" HARP and Shanquita POTTS with violations of Title 21, United States Code, Section 841(a)(1).
4. This affidavit is submitted in support of a criminal complaint and does not purport to set forth all of my knowledge of, or investigation into, this matter. The information set forth in this affidavit is based upon my experience, training, personal knowledge, observations, and consultations with other law enforcement investigators and agents, and other sources of information related to this investigation.

**PROBABLE CAUSE**

5. Terrell DAVIS a/k/a "Ralo," is the leader of the criminal street gang "Famerica," and a hip-hop music artist. The investigation has revealed that members of the gang refer to themselves as "Famgoon." DAVIS and other gang members frequently wear clothing adorned with Famerica or Famgoon logos. At DAVIS' direction, gang members sell drugs and firearms and engage in other traditional street gang activities.
6. Pursuant to a grand jury subpoena return, on December 17, 2017, the Charter Sales Coordinator of Centurion Jet (now known as Global Jet) sent an email to ralo.famerica@gmail.com, an email address previously identified to be used by DAVIS, to request the list of individuals flying on a roundtrip flight from Atlanta, Georgia to Sacramento, California and back. On the same date,

Ralo.famerica@gmail.com replied with 11 names, including his own, Antoine MORRISON, [REDACTED], William Miller (an alias for William RHODES) and Kevin Harpe (HARP). Also included in the response email from ralo.famerica@gmail.com was a request to depart from Atlanta at 4:00pm on December 18, 2017 and to depart California at 1:00pm on December 22, 2017.

7. On December 18, 2017, DAVIS and a group of approximately ten individuals boarded a roundtrip flight from Fulton County Airport to Sacramento, California. Airport surveillance footage showed that DAVIS and all other individuals arrived at the airport in two black vans, one Mercedes Sprinter van and one Ford Econoline van. They then departed on the chartered jet.
8. Four days later, on December 22, 2017, DAVIS' charter flight returned to Fulton County Airport at about 5:00 a.m. EST. Surveillance teams made up of members of the ATF, FBI and the Georgia State Patrol (GSP) saw two black vans waiting for the jet's arrival, consistent with the same vans that dropped the passengers off. After the plane parked, surveillance teams saw DAVIS and the other passengers transfer thirty-seven (37) packages wrapped in white holiday paper from the jet to the Econoline van. An employee of the charter company spoke with DAVIS and offered to help unload the holiday packages, but the passengers declined his help. Three passengers got in the Econoline van and drove away. DAVIS and the rest of the passengers then left in the Sprinter van.
9. Georgia State Patrol (GSP) conducted a traffic stop of the Econoline van, after observing the van traveling in the dark without its lights on. GSP stopped the vehicle in close proximity to Fulton County Airport-Brown Field. Three passengers occupied the vehicle: Kevin HARP, [REDACTED], and [REDACTED]. The van

was registered to DAVIS with an address of 1945 Kimberly Road SW, Atlanta, Georgia 30331.

10. GSP Officers advised when they approached the vehicle they noted a strong odor of marijuana emitting from the vehicle. Officers conducted a search of the vehicle and located approximately 520 pounds of marijuana wrapped in white holiday wrapping paper in the rear of the van. The estimated street value of the marijuana is approximately \$1,000,000. The three passengers, HARP, [REDACTED], and [REDACTED] were arrested.
11. All three of the individuals arrested were wearing clothing that featured the words “Famerica” and “Famgoon.” While conducting an inventory of the vehicle, it was noted that nearly every personal travel bag that was located in the vehicle had similar clothing inside.
12. On December 23, 2017, the Instagram account belonging to DAVIS, “RaloFamgoon,” posted a picture of DAVIS by a swimming pool with the narrative: Ralofamgoon: “I’ve lost more than an man have gained in a lifetime...Have you ever lost ah million dollars at one time???”
13. On this same Instagram account, multiple videos were posted of DAVIS on December 21, 2017 exiting a black Sprinter van and getting onto a private jet surrounded by numerous black males wearing clothing similar to the clothing recovered in the van with the marijuana.

14. On December 27, 2017, ATF received the passenger list for the December 22, 2017 flight. The names on the official flight manifest included Terrell DAVIS, Michael HUNICUTT, Antoine MORRISON and [REDACTED].

15. During an inventory of the Econoline van, agents recovered personal property and identification cards inside luggage where the marijuana was found. Identification documents for Terrell DAVIS, [REDACTED] and William RHODES were all found in various bags adjacent to where the 37 packages of marijuana were recovered.

16. On Saturday, April 14, 2018, ATF and FBI received information that DAVIS traveled to northern California and would be traveling back to Atlanta, Georgia via a privately chartered jet from Sacramento, California. Given the events of the December 22, 2017 flight and subsequent marijuana seizure, agents in Sacramento established surveillance on DAVIS in California.

17. On April 14, 2018, at approximately 21:15 hours, PST (Pacific Standard Time) DAVIS arrived at the McClellan Sacramento Airport. Five black males and one black female, dressed in Famerica/Famgoon clothing, loaded luggage into an awaiting aircraft. The aircraft was white and had a gold tail and gold and black stripe with tail number N168CE. In addition, agents also saw these individuals load approximately 17 packages into the baggage compartment of the aircraft.

18. The 17 packages loaded into the jet were wrapped in what appeared to be white paper and were similar in size to the packages seized after the December 22, 2017 flight. Soon after the packages were loaded onto the aircraft, the five individuals boarded the plane. At 22:35 hours PST, the aircraft departed McClellan Sacramento Airport.

19. Agents in Atlanta obtained the flight information for the aircraft, which originally planned to arrive at Cobb County International Airport. However, during the flight, the destination was changed from Cobb County International Airport to Peachtree-DeKalb Airport (PDK).
20. Agents then learned that the aircraft bearing tail number N168CE was scheduled to arrive at PDK and park at Atlantic Aviation, a fixed base operator (FBO) at the airport. ATF, FBI, DeKalb County Police Department (DKPD), and Georgia State Patrol (GSP) personnel set up an operation to conduct surveillance and possibly interdict suspected narcotics from the aircraft after it arrived.
21. On April 15, 2018, at approximately 5:05 am EST, two vehicles, a Chrysler 300 and a black Econoline van, arrived at Atlantic Aviation at the PDK airport. Both vehicles appeared to be occupied by two individuals. The vehicles waited outside the gate leading to the tarmac. I overheard communications from the plane to employees of the FBO that the individuals on board asked that no one help unload items from the plane after it landed and that the passengers and the people picking them up from the airport would unload everything.
22. The aircraft landed, taxied and parked at the FBO at approximately 5:20am EST. As soon as the aircraft parked, two vehicles drove up to the aircraft through the security gate. A Chrysler 300 drove to the front of the aircraft where the boarding door was located and a Ford Econoline van drove directly to the rear of the aircraft and backed up to the cargo compartment door of the aircraft. Some of the individuals on the plane disembarked the plane carrying personal luggage and placed it into the Chrysler 300. Others disembarked the aircraft and got into the Econoline van. The pilots of the aircraft were still onboard the aircraft while people were moving back and forth on the tarmac.

23. The Chrysler 300 then left the aircraft with two individuals, later identified as William RHODES and Antoine MORRISON, inside and traveled back out of the secure area. The GSP stopped this vehicle as it left the gate and law enforcement personnel conducted the interdiction of the aircraft on the tarmac.
24. Eight of the passengers were taken into custody immediately while one individual remained onboard the aircraft. ATF Special Agent James Nash saw the rear cargo door close as law enforcement approached the plane. Verbal commands were given for the occupant, later identified as DAVIS, who closed the door, to show himself and exit the aircraft.
25. Agents smelled a strong odor of marijuana coming from the door of the airplane and near the door of the cargo bay. DAVIS refused to comply with commands and a team of law enforcement personnel was utilized to make entry from the front of the aircraft to allow a K-9 to secure the rear occupant. After the K-9 was introduced, DAVIS advised he would comply and he was taken into custody as he exited the rear cargo area.
26. Located in the rear cargo area were 17 packages wrapped in white paper matching the description provided by the Sacramento agents. These packages were estimated to be approximately 25 pounds each and they were wrapped in white holiday wrapping paper very similar to the paper design that the seized narcotics were wrapped in on December 22, 2017. One of the packages had a tear on its corner making a green substance wrapped in clear cellophane plastic visible inside the wrapping paper. The other packages were searched and found to contain marijuana. The total weight of the marijuana was approximately 444 pounds with an estimated a street value of approximately \$840,000.00.
27. After the marijuana was discovered, the following nine individuals were arrested:

- a. Terrell DAVIS
- b. William RHODES
- c. Brenton MITCHELL
- d. Antoine MORRISON
- e. Quintavis SCOTT
- f. Bilal MUHUMMAD
- g. Michael HUNNICUTT
- h. Christian HARP
- i. Shanquita POTTS

28. Six of the nine individuals that were arrested were wearing "Famerica" or "Famgoon" attire.

29. During the interview of the flight crew, the co-pilot advised he noted the odor of marijuana, which was being smoked onboard the aircraft during the flight. The Flight Attendant further advised that those who were onboard the aircraft did not allow any of the flight crew or FBO personnel to assist with handling any baggage, including the items that were in the rear cargo hold. Further, passengers told the flight attendant and FBO personnel that passengers would move the items off the plane. This information was transmitted to the FBO while the plane was still in flight and after the plane landed.

30. On April 15, 2018, ATF and FBI interviewed the flight crew and requested a copy of the passenger manifest. I reviewed the manifest from the cockpit. The ExecuFlight agreement for Trip #8450, which was paid for (\$41,590.58) and signed

by MORRISON, and listed MORRISON, RHODES, POTTS, MUHUMMAD and HARP as the passengers.

### **CONCLUSION**

31. Based upon my training and experience, and the facts set forth in this affidavit, there is probable cause to believe that Terrell "Ralo" DAVIS, [REDACTED], [REDACTED], Kevin "K" HARP, William "Chaos" RHODES, Brenton "OG" MITCHELL, Antoine "Shonuff" MORRISON,, Quintavis "Drakko" SCOTT, Bilal MUHUMMAD, Michael "Cutt" HUNNICUTT, Christian "K" HARP and Shanquita POTTS did knowingly and intentionally combine, conspire confederate, agree and have a tacit understanding with each other and other persons, to possess with the intent to distribute marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(b)(1)(B) and 846.